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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
CAROL MALDONADO VASQUEZ,  
  
Defendant.

CASE NO. 1:20-CR-00175-NODJ-BAM

STIPULATION TO VACATE TRIAL AS TO  
CAROL MALDONADO VASQUEZ AND SET  
CASE FOR STATUS CONFERENCE AND ORDER  
THEREON

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for a trial confirmation hearing on April 29, 2024, and a trial on May 14, 2024, at 8:30 a.m.

2. On February 16, 2024, Ms. Vasquez substituted her attorney. The prior attorney and the government are in the process of providing the voluminous discovery to Ms. Vasquez's new attorney. The parties also anticipate that Ms. Vasquez's new attorney will need additional time to review that discovery, meet with his client, and conduct independent investigation. Ms. Vasquez's new attorney also seeks time to discuss a pretrial resolution of the case with the government. Given all the preparation that is needed, Ms. Vasquez's new attorney cannot be ready for trial on May 14, 2024.

3. Moreover, pursuant to a stipulation submitted this morning, the government anticipates that all remaining codefendants will have vacated the trial, leaving only Ms. Vasquez's case left.

4. Thus, **the parties agree to vacate the trial and trial confirmation hearing as to Ms.**

**Vasquez and set the case for a status conference on May 8, 2024 at 1:00 p.m.**

5. The parties agree and stipulate, and request that the Court find the following:

a) The discovery associated with this case includes case includes voluminous investigative reports, wire interceptions recordings and electronic messages, precise location information data, and cellular phone downloads, totaling thousands of pages of discovery and several gigabytes of electronic data.

b) Defense counsel requests the additional time to review the discovery, meet with his client, conduct independent investigation, and discuss a pretrial resolution with the government.

c) The defendant is currently out of custody.

d) Counsel for the defendant believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

e) The government does not object to the continuance.

f) Time has already been excluded to May 14, 2024. But the parties further believe that time should be excluded, in that failure to grant the requested case schedule would unreasonably deny the defendant continuity of counsel, and unreasonably deny the defendant the reasonable time necessary for effective preparation, taking into account the parties' due diligence in prosecuting this case. 18 U.S.C. Section 3161(h)(7)(B)(iv). Based on the above-stated findings, the ends of justice served by the schedule as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act. Therefore, the parties request that the Court exclude the time through the status conference on May 8, 2024, from calculations under the Speedy Trial Act.

IT IS SO STIPULATED.

Dated: March 4, 2024

PHILLIP A. TALBERT  
United States Attorney

By: /s/ JUSTIN J. GILIO

JUSTIN J. GILIO  
Assistant United States Attorney

Dated: March 4, 2024

/s/ Miles Harris  
Attorney for Defendant  
CAROL MALDONADO VASQUEZ

**ORDER**

IT IS SO ORDERED that the jury trial set for May 14, 2024 and trial confirmation set for April 29, 2024 are vacated. The status conference is set for March 27, 2024 is continued to **May 8, 2024, at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe.** Time was previously excluded through May 14, 2024.

IT IS SO ORDERED.

Dated: March 5, 2024

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE